

# EXHIBIT G

**MEMORANDUM**

To: Files

From: Rusty McCormack 

Date: January 19, 2006

Re: **Knicks Employee Relations Issues**

I have reviewed the report of the investigation conducted by Rochelle Noel and John Moran regarding the allegations recently made by Anucha Browne Sanders and her counsel. In light of that report I am making certain recommendations.

**Anucha Browne Sanders**

As the report indicates, most of Browne Sanders' allegations were not confirmed. However, based on comments Browne Sanders made to Steve Mills and members of her department before making her complaint, it is clear that Browne Sanders has a poor relationship and difficulty interacting with Mills and other members of MSG management. Browne Sanders is unable to function effectively in her position. Moreover, MSG cannot function if its senior management cannot communicate and work together effectively. In light of this, and considering related issues with Browne Sanders' communication skills and overall effectiveness, Browne Sanders should be separated from MSG and offered severance and outplacement services, subject to her execution of an appropriate release.

**Isiah Thomas**

As indicated above, most of Browne Sanders' allegations against Thomas were not confirmed. Based on the interviews, the investigation made clear that Browne Sanders and Thomas had a number of business disagreements and differences in philosophy and management style. Other employees asserted that Thomas has on occasion used profanity and has raised his voice in the workplace at MSG. He also acknowledged that on one occasion he greeted Browne Sanders with a hug and kiss. In light of the above, I recommend that Thomas undergo one-one-one sessions with a qualified outside expert in order to sensitize him further with regard to the concerns that his conduct could raise in a corporate environment and in light of company policy. This can be dovetailed with our ongoing efforts to work with Thomas to help him manage his organization and deal effectively with other people in the Knicks organization and at MSG. This training should begin in the next 30 days.

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**MSG 6363**

**Steve Mills**

The investigation did not establish that Mills contravened the company's anti-harassment policy. In fact, as the report indicates, Mills took appropriate action to respond to the incidents that were called to his attention. Nevertheless, it is my experience that these situations can be used as learning tools to improve effectiveness in the future. I therefore recommend that Mills meet with my counterparts from Corporate and Rainbow, Rob Doodian and Frank Livoti, who have not been involved in this matter, to discuss what lessons, if any, may be learned from the facts described in the report. This meeting should occur in the next 30 days.

# EXHIBIT H

1 MILLS

2 Those are generally the responsibilities.

3 Q. Okay. I think your previous  
4 answer may have touched on this, but why  
5 is it that you hired Ms. Browne-Sanders?

6 A. I thought she was -- I thought  
7 she -- she had a skill set and  
8 that -- that would -- that was a good fit  
9 for what I was looking for within the  
10 Knicks organization.

11 Q. And what were you looking for  
12 within the Knicks organization at that  
13 point?

14 A. I think -- did I answer that?

15 Q. Well, I think your answer might  
16 have alluded to it. If there is anything  
17 else you want to add to it, that is fine.

18 A. I think I -- I think I -- I  
19 answered that.

20 Q. Okay. Were you looking to hire  
21 someone to reorganize the Knicks  
22 operations at that point?

23 A. I -- I wanted someone to -- to  
24 add some more structure to the marketing  
25 department and the activities that took

1 MILLS

2 were -- was hired?

3 MR. GREEN: Objection to form.

4 You may answer, Mr. Mills.

5 A. No.

6 Q. Ms. Browne-Sanders started as a  
7 vice president of marketing in November of  
8 2000. Does that sound right to you?

9 A. That sounds right.

10 Q. Okay. She was in that role  
11 until she was promoted to senior vice  
12 president of business operations; is that  
13 correct?

14 A. Yes.

15 Q. And who was responsible for  
16 Ms. Browne-Sanders' promotion to that  
17 position?

18 A. I was.

19 Q. Anyone else?

20 A. Well, ultimately all promotions  
21 have to be signed off  
22 through -- through -- through our human  
23 resources department, but ultimately I was  
24 responsible for the promotion.

25 Q. Did you consult with anyone

1 MILLS

2 MR. GREEN: You may answer, Mr.  
3 Mills, subject to my objection that it has  
4 been asked and answered.

5 A. You know, I -- I may have talked  
6 to her about the -- the quality of -- of  
7 the Knicks organization, but I know I also  
8 specifically had conversations with her  
9 and concerns about how she was as long and  
10 as a strategic matter structuring the  
11 Knicks organization.

12 Q. Okay. We will -- we will come  
13 back to 2005. There came a point in 2002  
14 in which Ms. Browne-Sanders was promoted I  
15 think you've said, correct?

16 A. Yes.

17 Q. And what was the position that  
18 Ms. Browne-Sanders was promoted to?

19 A. I believe Anucha was promoted  
20 into the -- a position of senior vice  
21 president of marketing and business  
22 operations at a time when I -- I did  
23 a -- I actually restructured both the  
24 Knicks and the Rangers to create a  
25 comparable position in both -- both

1 MILLS

2 A. Normally I would involve our  
3 finance -- one of our finance people and  
4 someone from human resources in the  
5 drafting of it.

6 Q. Does the document that begins on  
7 page 1881 accurately describe the position  
8 of senior vice president of business  
9 operations that Ms. Browne-Sanders held  
10 beginning in March of 2002?

11 A. Yes.

12 Q. Did the position have any --  
13 MR. MINTZER: Strike that.

14 Q. Are you familiar with the phrase  
15 "dotted line reporting relationship"?

16 A. Yes.

17 Q. Did the SVP of business  
18 operations position have any dotted line  
19 reporting relations?

20 MR. GREEN: If know, Mr. Mills.

21 A. I'm not sure.

22 Q. Did you ever tell  
23 Ms. Browne-Sanders that she had a dotted  
24 line reporting relationship to anyone?

25 A. No.



1 MILLS

2 a much more strategic and -- and revenue  
3 generation responsibility within -- within  
4 the budget. In '05 we were going into a  
5 situation with -- where the Rangers were  
6 coming out of a lockout, so they were back  
7 in business whereas in the prior season  
8 there was no ranger activity. So I was  
9 actually more involved on the Knicks side  
10 at that point, but moving into '05 both  
11 the Knicks -- the senior vice president of  
12 business operations for the Knicks and the  
13 senior vice president of business ops for  
14 the Rangers had to really take charge of  
15 the entire strategic process, the entire  
16 budget process from start to finish, and I  
17 was less directly involved in the -- in  
18 the creation process leading up to the  
19 final product.

20 Q. Was there -- are you familiar  
21 with the phrase P and L manager?

22 A. Yes.

23 Q. And at some point did the SVP of  
24 business operations position for the  
25 Knicks become a P and L manager?

1 MILLS

2 A. Yes.

3 Q. When was that?

4 A. Sometime in -- at some point  
5 in -- in '04.

6 Q. Did the job of becoming a P and  
7 L manager coincide with the greater  
8 responsibilities in terms of the budgetary  
9 process that you -- you just were  
10 mentioning?

11 A. Yes.

12 Q. Did the increased  
13 responsibilities of the senior vice  
14 president of business operations position  
15 that you described, were those ever  
16 reflected in a document that you've seen,  
17 anything in writing?

18 A. They -- they were reflected  
19 in -- in -- in conversations that we  
20 had. They were reflected in a -- a salary  
21 adjustment as the grade changed -- change  
22 in the position took place.

23 Q. My question was: Did the  
24 description of the increased  
25 responsibilities, did that appear in a

1 MILLS

2 with Mr. Dolan about each of those  
3 reasons?

4 A. I had conversations with -- with  
5 Rusty McCormack about -- about those  
6 reasons, and, you know, I had  
7 conversations with Jim clearly about those  
8 views and clearly some of those reasons.

9 Q. So at some point you discussed  
10 with Mr. Dolan all of your concerns and  
11 criticisms about Mr. Browne-Sanders that  
12 you articulated in your previous answer?

13 MR. GREEN: Objection to form.  
14 You may answer, Mr. Mills.

15 A. Yes.

16 Q. But I take it from your answer  
17 that Mr. Dolan had the ultimate  
18 determination to -- whether to fire  
19 Ms. Browne-Sanders?

20 A. Absolutely.

21 Q. And so it's fair to say when I  
22 asked you why she was fired you don't know  
23 what was in Mr. Dolan's head when he  
24 decided to fire her; is that correct?

25 A. No, I don't know what was

1 MILLS

2 A. Well, the way -- the way we  
3 budget is that every budget process before  
4 we even start to talk about numbers  
5 we -- we talk about what the brand of the  
6 -- the various entities that we are  
7 working with is, what the key brand  
8 attributes are, what the mission statement  
9 of the -- the team or the organization is,  
10 then build up into that what the key  
11 objectives, strategies, goals and tactics  
12 to support what you define as the -- as  
13 the brand of the team and how that  
14 ultimately translates into a process that  
15 filters down to build their financial  
16 model for the team -- for the year.

17 Q. Did you believe that  
18 Ms. Browne-Sanders had any deficiency  
19 in -- in branding the team?

20 A. She -- she clearly had  
21 deficiencies in -- in industry -- in  
22 defining a strategic direction for -- for  
23 the team as we were -- were trying -- as  
24 we were trying to move forward, and I  
25 think she had -- had issues in terms of

1 MILLS

2 being able to listen to what people were  
3 asking of her and listen to how they  
4 wanted the branding strategy to be  
5 articulated and how they wanted the  
6 branding strategy to roll up into this  
7 pyramid -- pyramid that we build as part  
8 of the branding process, and I think -- I  
9 think she had real issues of structurally  
10 putting those things together and seeing  
11 how they all fit. Some of them started  
12 with maybe some additional help that she  
13 needed in terms of structural process, but  
14 some of them started with her inability or  
15 unwillingness to really focus and listen,  
16 and as she and I tried to have these  
17 conversations about why the training was  
18 important and what she should try to get  
19 out of it initially before she decided to  
20 take the training, her tact was more to  
21 attack Jim and/or try to articulate that  
22 Jim didn't understand really what  
23 a -- what branding is or what a real brand  
24 statement is or what brand attributes are  
25 as opposed to listening to what needed to

1 MILLS

2 Q. You said at one point in your  
3 testimony that you had been informed that  
4 Ms. Browne-Sanders was saying that you  
5 were at fault for something that went  
6 wrong in the budget meeting?

7 A. Yes.

8 Q. And who were you informed of  
9 that by?

10 A. John Cudmore, who is the  
11 financial -- senior vice president of  
12 finance for the teams. We had, you  
13 know -- after -- after one of the budget  
14 meetings, John told me that, you know,  
15 Steve, you should just know that I had a  
16 conversation with Anucha, and she really  
17 is accusing you of this -- of Last Man  
18 Standing being your responsibility, and I  
19 told him I -- my amazement at -- at that,  
20 and what I did was we had -- I had a  
21 meeting with Anucha and Mike Golub and  
22 John Cudmore to talk about what my  
23 expectations of them in -- in the budget  
24 process, what I expected to happen as  
25 we -- as we further moved through the

1 MILLS

2 A. With counsel.

3 Q. Okay. Prior to learning that  
4 Ms. Browne-Sanders' lawyers had contacted  
5 The Garden, could you tell me all of the  
6 people who you told that  
7 Ms. Browne-Sanders had told you that she  
8 could no longer perform her duties at The  
9 Garden?

10 A. The -- the only people I  
11 remember having that conversation with  
12 were Rusty and -- and Hank. I can't  
13 remember whether or not I -- I had the  
14 conversation with Jim.

15 Q. And did either Mr. McCormack or  
16 Mr. Ratner suggest that Ms. Browne-Sanders  
17 receive a severance package?

18 A. What -- what Hank said to me was  
19 you should -- you should get together with  
20 Rusty and let's figure out some kind  
21 of -- let's figure out some kind  
22 of -- some kind of package to make sure  
23 that this happens.

24 Q. And by package you understood  
25 that he was taking about a severance

# EXHIBIT I



1 JEFFREY NIX

2 A I think she was outstanding.

3 Q So regardless of what the facts  
4 are of any of the occurrences that form  
5 the basis of her lawsuit, your opinion of  
6 her hasn't changed?

7 A I think she was excellent at what  
8 she did.

9 Q And you continued to believe that  
10 she would be an excellent and competent  
11 employee for any company?

12 A Any company.

13 Q Going back to the summer of 2005,  
14 did there ever come a time when she told  
15 you that she had been at a meeting at  
16 which Jim Dolan and Hank Ratner, at least,  
17 were in attendance where she had been  
18 criticized for her budgeting abilities?

19 MR. MINTZER: Objection to form.

20 A She told me she had some hostile  
21 budget meetings.

22 Q When did she first tell you about  
23 hostile budget meetings?

24 A It was after whenever they had  
25 the budget meetings. I don't recall the

1 JEFFREY NIX

2 have been something to the effect, "Hey,  
3 if I can help you in any way try to find  
4 another source of employment, please let  
5 me know."

6 Q What, if anything, have you done  
7 to help her find employment?

8 A I've sent her resume out to some  
9 friends of mine.

10 Q And who did send her resume to?  
11 Scott Paddock, Gatorade.  
12 Joe Mature, University of  
13 Minnesota.

14 Q Let me ask you to go a little  
15 slower. These are names I haven't heard  
16 before.

17 Scott Paddock?

18 A Scott Paddock.

19 Q P-A-D-D-O-C-K?

20 A Yes.

21 Q At Gatorade?

22 A He's at Gatorade.

23 Q Okay.

24 The next one?

25 A I sent it to Joe Mature,

1 JEFFREY NIX

2 M-A-T-U-R-E. He is the athletic director  
3 at the University of Minnesota.

4 Boo Corigan.

5 Q B-O-O?

6 A B-O-O.

7 Q C-O-R-I-G-A-N?

8 A Yes.

9 Q And where is he or she?

10 A He's at the University of Notre  
11 Dame.

12 Q Okay.

13 A Tim Andree who is -- he's in  
14 advertising for a marketing firm here in  
15 the City.

16 Q I'm going to stop you for a  
17 moment.

18 T-I-A?

19 A Tim. Tim.

20 Q Tim. I'm sorry. Tim Mondre?  
21 M-O-N --

22 A Andree, A-N-D-R-E-E.

23 He's at a marketing company in  
24 the City. I can't think of the name of  
25 it.

1 JEFFREY NIX

2 Q Oh, you can't think --

3 A I can't think of the name of it,  
4 no.

5 Q Okay.

6 Anyone else?

7 A There could have been. I can't  
8 remember right now.

9 Q And did you send any kind of a  
10 cover letter with her resume?

11 A Not a cover letter. Probably I  
12 got in just a note, "Hey, just, you know,  
13 take a look at this and see what you  
14 think, and if anything develops or opens  
15 up please, give her some consideration."

16 Q Did any of them contact you  
17 telling you that they had openings?

18 A Yeah, I talked to them and they  
19 said there's really nothing available.

20 Q When you say you talked to them,  
21 are you --

22 A Scott Paddock talked to me and  
23 said, "Hey, you know, I'll keep an eye  
24 out. We don't have anything available. I  
25 don't see anything right now."

1 JEFFREY NIX

2 Joe Mature just said, "Hey,  
3 thanks." There was no response from that,  
4 other than that.

5 Boo Corrigan is similar to Scott  
6 Paddock. Keep it on file, if something  
7 happens.

8 And then Tim Andree said, "Hey,  
9 thanks for Anucha's resume. Right now it  
10 would be a tough hire because it's  
11 volatile. It's a volatile situation."

12 Q And have you had any  
13 conversations with any of these people  
14 since then?

15 A Yeah, they are friends of mine.

16 Q Okay.

17 So you are saying you talk to  
18 these people on a -- on a periodic basis?

19 A Yeah, I talk to them.

20 Q Have any ever them indicated  
21 there are any job openings for which  
22 Anucha Browne Sanders might be eligible?

23 A Nothing yet. That's the  
24 impression I have.

25 Q And what has Anucha

# EXHIBIT J

1 H. RATNER

2 meetings or some other type of, you  
3 know, strategy meeting. That would be  
4 the lion's share of the interactions.

5 Q. Do you have any estimate of  
6 how many budget meetings that you were  
7 at that Ms. Browne-Sanders was at?

8 A. Budget meetings. Let's see.  
9 You know, a few. I'm guessing now  
10 which maybe I shouldn't do, but, you  
11 know.

12 MS. VLADECK: It's not  
13 hitting you, it's okay?

14 MR. GREEN: It's okay.

15 A. Five, six, you know,  
16 something like that. I could be off by  
17 two in either direction, you know,  
18 maybe.

19 Q. And what about forecast  
20 meetings?

21 A. You know, maybe a few more  
22 than that.

23 Q. So a few more than five or  
24 six, off by two potentially, either  
25 way?

1 H. RATNER

2 A. Give or take. You know,  
3 it's -- that's the kind of ballpark, I  
4 mean, you have the first quarter  
5 forecast, the second quarter forecast,  
6 your third quarter forecast might be  
7 budget meetings so it might not be a  
8 separate meeting. Those often get  
9 combined. You know. And then I can't  
10 quite figure out, you know, exactly the  
11 time period of when it would occur. So  
12 I'm trying to just do some general  
13 calculations figuring. Those are sort  
14 of the ball parks.

15 Q. And what about the strategy  
16 meetings?

17 A. Well, we usually have a  
18 strategy meeting preceding a budget  
19 meeting in order to determine how the  
20 budget should be done because we view  
21 budgets as numerical expressions of the  
22 strategy, so. And then sometimes you  
23 have a strategy meeting and, you know,  
24 there's -- there's not agreement on the  
25 strategy that was presented as the



1 H. RATNER

2 appropriate strategy, and then you have  
3 the strategy meeting over again. So  
4 that's why I can't really recall  
5 exactly how many we might have had,  
6 just because there's a one year  
7 strategy, you know. One year budget  
8 doesn't mean that you only had one  
9 strategy meeting because you might have  
10 gone back. So I don't specifically  
11 recall exactly how many, but, you know,  
12 a few again.

13 Q. Do the strategy meetings  
14 determine how a budget is going to be  
15 done in a particular year?

16 A. Well, you know, we sit down  
17 and we'll try to understand basically  
18 the goal of the business, and the  
19 strategy and the overlying tactics.  
20 And to go and prepare numbers before  
21 that, you might be preparing numbers on  
22 something that there isn't management  
23 buy in on. So we have the strategy  
24 meeting up front. And then once we  
25 agree on that strategy, the business

1 H. RATNER

2 end is to go off to express that  
3 strategy in numbers and come up with  
4 their budget for the year.

5 Q. And the strategies change  
6 year to year or may change year to  
7 year?

8 A. Yeah, they may change midyear  
9 as well. But, you know, we look, we  
10 try to do a bottoms up look, you know,  
11 take a fresh and not be a prisoner to  
12 what you may have thought was  
13 appropriate the year before.

14 Q. And who would be present at  
15 the strategy meetings, generally?

16 A. Relating to what business?

17 Q. The Knicks.

18 A. It would be Jim, myself,  
19 Steve, and it would be then the people  
20 in Steve's staff that Steve would then  
21 bring.

22 Q. And who did he bring?

23 MR. GREEN: Objection to  
24 form. You may answer if you  
25 recall.

1 H. RATNER

2 A. Well, Anucha when she was  
3 with the company, John Cudmore, the  
4 head of finance for the team's  
5 division. You know, I don't have  
6 specific recollection of who else, you  
7 know. Potentially there could have  
8 been ad salespeople, there could have  
9 been facilities people. You know, I  
10 don't remember.

11 Q. Were the same participants  
12 present at the strategy meetings as  
13 were at the forecast and budget  
14 meetings?

15 A. Sometimes they may have been,  
16 they may not have been.

17 Q. And what would be the  
18 determinative as to who was at which  
19 meeting?

20 A. Well, the strategy meeting  
21 would be more of a strategy and less of  
22 a numbers meeting. So you might not  
23 have people who were, you know, more  
24 involved in the numbers than involved  
25 in actually the strategies, too, or

1 H. RATNER

2 what to do going forward, so.

3 Q. And what was Mr. Cudmore's  
4 title at the time that he would attend  
5 these meetings?

6 A. I don't know.

7 Q. What was Ms. Browne-Sanders'  
8 title at the time she would attend  
9 these meetings?

10 A. I'm not sure.

11 Q. What was your understanding  
12 of Mr. Cudmore's role at the meetings?

13 A. John's the finance guy. He  
14 works with the businesses. He takes  
15 their direction as to what business  
16 initiatives they want and he helps them  
17 put that into a, you know, financial  
18 format.

19 Q. And what was your  
20 understanding of Ms. Browne-Sanders'  
21 role at these meetings?

22 A. She was the head of marketing  
23 and, I think, business operations.

24 Q. And what was your  
25 understanding that her role as a

1 H. RATNER

2 participant in these meetings was to  
3 be?

4 MR. GREEN: Objection to  
5 form. You may answer.

6 A. Okay. Strategy, budget,  
7 forecast, which one?

8 Q. All.

9 A. All of them. Well, the  
10 strategy meeting, you know, you'd  
11 really have to speak more to Steve  
12 about that as to how Steve Mills split  
13 and determined, you know,  
14 responsibilities with Anucha. So I  
15 can't really get underneath that.

16 Q. Okay.

17 A. But what they needed to do  
18 with -- the business unit needed to do  
19 is come in with a, you know, a  
20 strategic plan. So for the strategy  
21 meeting, her role would have been what  
22 Steve asked her to do. You know, what  
23 I would have been looking for, what I  
24 look for is the strategy to be  
25 presented that has logic and makes

1 H. RATNER

2 sense and, you know, comes up with a  
3 path of growth for the business.

4 After we get out of the  
5 strategy meeting, you go to the budget  
6 meeting, you know, likewise, you know,  
7 it's Steve and whatever  
8 responsibilities he's given to Anucha.  
9 But Anucha's job was to be the P&L  
10 manager for the Knicks's business unit,  
11 and as such, she was responsible for  
12 the budgeting. And likewise, when we  
13 had forecast meetings, you're  
14 reforecasting with the knowledge that  
15 you now have given the time that's  
16 passed and you have your quarterly  
17 results and you're taking a comparison  
18 budget and you're updating on what you  
19 think is going to happen for the year  
20 and you're comparing it against the  
21 budget. So, you know, my thinking  
22 would be she probably would be leading  
23 that effort and pulling it all together  
24 on behalf of the Knicks organization.

25 Q. Before you go to

1 H. RATNER

2 Ms. Browne-Sanders' role at forecast  
3 meetings, what was your understanding  
4 of how long Ms. Browne-Sanders had been  
5 the P&L manager?

6 MR. GREEN: As of when?

7 Q. As of when? As of what date  
8 she became --

9 MR. GREEN: I don't mean to  
10 confuse you. I object to the form.

11 MS. VLADECK: That's already  
12 done.

13 MR. GREEN: I don't know  
14 whether the question was asking the  
15 witness to answer as of a certain  
16 date.

17 MS. VLADECK: Okay. I can  
18 rephrase it.

19 Q. Was it your understanding  
20 that Ms. Browne-Sanders was P&L manager  
21 from the date she was hired, or did she  
22 become the P&L manager at some time  
23 during her tenure?

24 A. She was not the date she was  
25 hired. She became sometime during her

1 H. RATNER

2 tenure.

3 Q. And do you know when during  
4 her tenure she became P&L manager?

5 A. No.

6 Q. Did she attend the strategy,  
7 budget or forecast meetings prior to  
8 becoming a P&L manager?

9 A. I don't know. Her  
10 involvement at the Garden preceded my  
11 involvement with the Garden.

12 Q. Was she present at the  
13 meetings, strategy, forecast and  
14 budget, from the day you became  
15 involved at the Garden?

16 A. Well, it wasn't necessarily  
17 from the day I became involved. I  
18 think my first real involvement in the  
19 Garden budget process was probably for  
20 calendar year 2005, the 2005 budget  
21 which was --

22 Q. Was that in 2004?

23 A. It would have been the end of  
24 '04. And that, I think, is my first  
25 involvement in a budget cycle at the



1 H. RATNER

2 Garden and really my, you know, first  
3 involvement with a lot of the stuff at  
4 the Garden as opposed to where I had  
5 been previously.

6 Q. And from that time, was  
7 Ms. Browne-Sanders, to your knowledge,  
8 P&L manager?

9 A. I think it might have been  
10 right around there, but again, I  
11 don't know. I'm not a hundred percent  
12 sure.

13 Q. And what was  
14 Ms. Browne-Sanders' role at forecast  
15 meetings?

16 A. Her role was to present the  
17 forecast.

18 Q. Now, at each of these  
19 meetings where Ms. Browne-Sanders was  
20 present, was Mr. Mills present?

21 A. Again, no specific  
22 recollection, but I think he would have  
23 been.

24 Q. And was Mr. Cudmore present?

25 A. Again, no specific

1 H. RATNER

2 Q. Somewhere between 10 and 20,  
3 or 15?

4 A. Ten and 15 maybe. Again, I'm  
5 being clear with you. I am sort of  
6 guessing on that number.

7 Q. Did you form an impression as  
8 to her performance?

9 A. I did.

10 Q. And what was your impression?

11 A. Underwhelming.

12 Q. What do you mean by that?

13 A. I didn't think she had the  
14 goods or temperament to do the job that  
15 we needed done.

16 Q. And when did you form that  
17 impression?

18 A. You know, I can't  
19 particularly pinpoint exactly when it  
20 occurred, when I first started having  
21 concerns, but it was clear to me that  
22 she didn't have a grasp of what it was  
23 going to take to get her job done, that  
24 she didn't have a grasp for the  
25 financial aspects of her position, and

1 H. RATNER

2 specific recollection of the strategy  
3 meetings other than I don't think they  
4 went well in that when we tried to be  
5 open minded and discuss thinking more  
6 broadly about the opportunity of the  
7 Knicks and the running of the Knicks,  
8 you know, my recollection is it's sort  
9 of was met with resistance. It was met  
10 with a lot of this is the way we do it.  
11 And where I was coming from, it's  
12 really about start over again and let's  
13 figure out if we were starting, you  
14 know, this franchise today, what do you  
15 do today, what are the strategies  
16 today, what are the business  
17 opportunities today, and don't lock  
18 yourself into the past.

19 And again, without specific  
20 recollection, there wasn't a lot of  
21 open minded behavior taking place. It  
22 was very, very defensive and sort of it  
23 makes very difficult to run a business  
24 and move forward if everybody is not  
25 open minded to change, because that's

1 H. RATNER

2 the one constant we're always going to  
3 have in the world, change.

4 You know, we then moved on  
5 and we got to the budgets and, you  
6 know, Anucha's command for the business  
7 of the Knicks just wasn't acceptable to  
8 me, you know, as the person sitting in  
9 the center. You know, she needed to be  
10 responsible for the business aspects of  
11 what was taking place. So for  
12 instance, you know, how many ushers  
13 were going to be at the event. How  
14 many security guards were going to be  
15 at the event. How many food service  
16 workers are going to be at the event.

17 Now, in our structure, those  
18 groups reporting to a facilities group.  
19 Because facilities is our in-house  
20 expert on ushers and security and food  
21 service. But the premise of our  
22 organization is that that facilities  
23 group works for the P&L manager. In  
24 almost like a, if you went to a third  
25 party vendor, you hired the third party

1 H. RATNER

2 vendor and the third party vendor works  
3 for you and performs certain services  
4 for you. But that doesn't mean you  
5 don't have responsibility for it. You  
6 do, because you have to work out with  
7 them what's the prudent level of  
8 ushers, security, food and beverage  
9 workers, etcetera. And those were the  
10 type conversations that were very  
11 frustrating because those were the kind  
12 of conversations which were well,  
13 that's sort of facilities, that's not  
14 me. And that was just dead wrong, as  
15 we tried to explain, you know, over and  
16 over again.

17 The same thing with  
18 sponsorship sales and ad sales. We  
19 have a centralized group that sells  
20 sponsorship sales and ad sales, and  
21 that group works for, you know, the  
22 individual entity. It's like an ad  
23 sales rep. So they work for the  
24 individual entity, whether it's the  
25 Knicks, whether it's the Rangers. It's

1 H. RATNER

2 the same thing, you know, for other  
3 parts of the company as well. But they  
4 have to please the business person  
5 who's running the business unit as  
6 opposed to the business person  
7 abdicating those responsibilities and  
8 basically well, that's ad sales or  
9 that's facilities.

10 And we had a very difficult  
11 time with Anucha in taking  
12 responsibility for those numbers. And,  
13 again, those numbers aren't numbers  
14 that just are presented to you. The  
15 job of the P&L manager is to go and  
16 dive into those numbers and to  
17 understand why we're doing what we're  
18 doing and get behind the numbers and be  
19 satisfied that those are the right  
20 numbers, whether they be expense or  
21 revenue.

22 And you know, I really felt  
23 that there was that disconnect that,  
24 you know, she wasn't getting it, she  
25 wasn't necessarily capable of getting

1 H. RATNER

2 it. She didn't have, I think, the real  
3 financial skills needed, and she was  
4 very territorial. She didn't cooperate  
5 well with others, so these  
6 interdependencies made it difficult.

7 So the concerns I started  
8 having from limited contact in '04  
9 became magnified by the budget process  
10 for the '05 fiscal year.

11 Q. And when was the budget  
12 meeting at which you say that it became  
13 magnified or the budget process, what  
14 time period was that?

15 A. You know, I'm not sure. I  
16 mean, I was guessing which I guess I  
17 shouldn't be doing, it would be the  
18 November, December. You know,  
19 sometimes budgets fall over and they  
20 don't get done and you use something  
21 for purposes of, you know, doing your  
22 consolidated look for the year, but you  
23 may continue the process beyond. I  
24 don't really remember in this instance  
25 what happened or what the timing was.

1 H. RATNER

2 Q. Season, summer, winter,  
3 spring or fall?

4 A. You've covered the options.  
5 You know, I'm still not sure. It was  
6 forecast meetings that then related to  
7 the 2005 budget that we had somewhere  
8 during the year.

9 Q. So was that in calendar year  
10 '04 or calendar year '05?

11 A. '05.

12 Q. You have no recollection of  
13 when in '05?

14 A. No, I don't.

15 Q. And who did you have  
16 conversations about Ms. Browne-Sanders  
17 with at that time?

18 A. Well, at that point, still  
19 Steve Mills and then Jim Dolan as well.

20 Q. Are Mr. Dolan, Mr. Pollichino  
21 and Mr. Mills the universe of  
22 individuals about whom you discussed  
23 Ms. Browne-Sanders' performance?

24 A. The universe I remember  
25 discussing.



1 H. RATNER

2 maybe you're having your forecast  
3 meeting then probably in May. But  
4 that's a guess. That would be the  
5 first quarter forecast. You'd have the  
6 second quarter forecast less than three  
7 months after that. So that probably  
8 gets you sometime during the summer.

9 Q. So your educated guess is  
10 that you had conversations with  
11 Mr. Mills and Mr. Dolan about your  
12 belief that Ms. Browne-Sanders should  
13 be fired either in the summer of '05 or  
14 May of '05?

15 A. If that's when those meetings  
16 occurred, yeah. It was right around  
17 one of those meetings. It was right  
18 around -- yeah. You know, again, I'm  
19 not sure which one.

20 Q. Is it fair to say you  
21 wouldn't have a forecast meeting past  
22 September of '05?

23 A. You know, it's possible, but  
24 sometimes we combine the forecast  
25 meeting with the budget meeting because

1 H. RATNER

2 know, different points in time. You  
3 know, the first point in time is Steve  
4 advising us that Anucha said she no  
5 longer could do her job and she wanted  
6 to leave. I embraced that and said,  
7 "Good. Figure out with the HR  
8 department what would be an appropriate  
9 severance and let part ways," as he  
10 knew that that was my long-standing  
11 opinion.

12 And, you know, after that  
13 point in time, while we were trying to  
14 at least figure out what would be an  
15 appropriate separation package, having  
16 what I considered accepting her  
17 resignation, then the thing became  
18 legal in nature and pretty much all  
19 conversations from that point, you  
20 know, included lawyers.

21 Q. Now, you said there were  
22 different points in time and that  
23 Mr. Mills had reported to you that  
24 Ms. Browne-Sanders came to him and said  
25 she could no longer do her job and

# EXHIBIT K

**Sr. Vice President, Business Operations  
New York Knicks**

***OPERATIONAL POSITION  
DESCRIPTION***

**OVERVIEW OF ROLE**

**Primary Responsibility:**

Overseeing all non-player related departments such as Marketing, New Media, Franchise Operations, Administration and Community Relations. This position directly impacts the strategic direction of the NY Knicks.

**Reports to:**

President, Sports Team Operations

**Manages:**

Director, Marketing Partnerships (6 direct reports)  
Director, Community Relations (3 direct reports)  
Director, Franchise Operations (2 direct reports)  
Director, Entertainment Marketing (2 direct reports)  
Director, Event Presentation (2 direct reports)  
Director, New Media

**Key Non-Reporting Relationships:**

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**MSG 01881**  
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Key contact	Description/Purpose
1. President & General Manager	Support on-court activities.
2. VP & Controller	Ensure budget and finance compliance.
3. SVP, Legal	Provide information and advise regarding legal matters, potential marketing campaigns and intellectual property rights issues.
4. VP, Public Relations	Support all PR initiatives for the team.
5. SVP, Marketing	Advise and provide marketing expertise.
6. SVP, Human Resources & Administration	Advise on HR requirements (Staffing, Employee Relations, HRMS and Policy Procedures).
7. SVP, Consumer Sales	Establish direction and policies for season ticket and individual ticket sales and servicing.

#### **OPERATIONAL ACTIVITIES OF THIS POSITION**

1. **Marketing** – Provides strategic marketing and brand development direction in order to drive ticket sales, demand for season tickets, franchise enhancement and promotions.
2. **Community Relations** – Involves players and coaches as an organization in community outreach initiatives including participation in Cheering for Children, community events, visiting schools, hospitals, clinics and making a difference in the community.

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**MSG 01882**  
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3. **Administration** – Plans, prepares and conducts weekly staff meetings. Interfaces with MSG Facilities to coordinate game operations and team scheduling, and with MSG Networks and other Garden administrative areas.
4. **Finance** – Oversees budget process and strategic performance of the NY Knicks, including budget meetings and quarterly reviews. Takes steps to achieve operating results.
5. **League Relations** – Interacts with the NBA across all team related functions including marketing, licensing and game operations.
6. **Public Relations** – Develops long-term strategy and programs in media relations, press events, announcements and coordinates with outside groups, celebrities and interested parties.

### QUANTITATIVE SCOPE

Measure	Approximate Value
1. Team Operating Revenue	141,000,000
2. Division OPBIDA	23,991,000
3. Team Operating Expenses	112,710,000
4. Regular Seasonal Games	82
5. Seating Capacity	19,763
6. Capital Expenditures	289,000

### KEY MEASURES OF SUCCESS

1. **Financial metric(s):**
  - a. Develop marketing programs, and sales strategies to maximize NY Knicks revenues in New York and outside markets that achieve goals of maximizing brand and profits.

- b. Develop marketing programs and sales strategies to maximize all NY Knicks events at Madison Square Garden.

2. Operating metric(s):

- a. Play a key role in identification and development of new strategic incentives to ensure long-term growth.
- b. Build and manage top-flight full service Marketing Department to support all corporate incentives.
- c. Develop effective and breakthrough marketing tools, advertising materials and promotional programs to support sales.

**POSITION'S ORGANIZATION**

Number of employees reporting <i>directly</i> to this position	6
Number of employees reporting <i>indirectly</i> to this position	30

**QUALIFICATIONS**

1. Management Skills

- a) High-energy, creative and innovative executive with strong written and verbal communication skills.
- b) Executive leadership qualities that will permit him/her to contribute significantly to the overall strategic direction of the company and to the resolution of key operating issues.
- c) Enthusiasm and energy to inspire and motivate others.
- d) Creative leader who can establish immediate credibility by virtue of the strength of his/her character and personality as well as his/her record of accomplishment in the marketplace.
- e) Ability to understand difficult organizational problems and to formulate and implement appropriate solutions.

1. Technical/Functional Competencies

6

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**MSG 01884**  
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- a) Understanding of NBA league requirements and employment laws as they relate to the union-management relationship and the interpretation of collective bargaining agreements.
- b) Knowledge of strategic planning and budgeting processes.
- c) Project management skills.

**1. Key Experiences/Achievements**

- a) A highly successful track record in the sports industry, preferably 10 years of sports experience, preferably in basketball of increasingly higher level management roles.
- b) Experience in marketing with the understanding of building, advertising, public relations, team services and front office administrations.
- c) A minimum of 10 years management experience.
- d) Network of contacts in the business, experience in evolving work environments and leading large, creative teams.

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**MSG 01885**

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# EXHIBIT L

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KEVIN T. MINTZER



WRITER'S DIRECT DIAL

403-7348

March 19, 2007

BY FEDERAL EXPRESS

Teresa M. Holland, Esq.  
Epstein, Becker & Green, P.C.  
250 Park Avenue  
New York, New York 10177

Re: Anucha Browne Sanders v. MSG, Isiah Thomas and  
James L. Dolan No. 06 CV 0589

Dear Teresa:

Enclosed are: (1) Plaintiff's Supplemental Disclosures Pursuant to Fed. R. Civ. P.26, which update plaintiff's damages calculations; (2) additional documents concerning plaintiff's job search bearing bates numbers Pl. 04482 through Pl. 05268.

We expect to provide a limited number of additional documents concerning plaintiff's job search within the coming days.

Sincerely,

Kevin T. Mintzer

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KTM:slr  
Enclosures

cc: Lisa Horwitz, Esq. (with enclosures – by federal express)

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X

ANUCHA BROWNE SANDERS,

Plaintiff,

- against -

MADISON SQUARE GARDEN, L.P.,  
ISIAH LORD THOMAS III, AND  
JAMES L. DOLAN,

Defendants.

-----X

06 Civ. 0589 (GEL)

PLAINTIFF'S SUPPLEMENTAL  
DISCLOSURES PURSUANT TO  
FED. R. CIV. P. 26

ECF CASE

Plaintiff Anucha Browne Sanders ("plaintiff" or "Browne Sanders"), by her attorneys Vladeck, Waldman, Elias & Engelhard, P.C., hereby provides the following information to defendants Madison Square Garden, L.P. ( "MSG"), Isiah Lord Thomas III ("Thomas"), and James L. Dolan ("Dolan") (collectively, "defendants"):

Fed R. Civ. P. 26(a)(1)(C): Plaintiff cannot fully calculate her damages at this time. However, based on the information that she currently possesses, plaintiff calculates her damages as follows: \$602,568 in back pay to compensate plaintiff, through October 1, 2007, for wages, bonuses, and 401(k) contributions that plaintiff would have received had she not been discriminated against and retaliated against by defendants, less work-related compensation that plaintiff expects to earn in mitigation of her damages through October 1, 2007. Plaintiff also seeks an Order that MSG convey to her all stock options previously granted to her that did not vest as a result of her unlawful termination from MSG, as well as to supplement her pension in the amounts that she would have received if she had remained employed at MSG. In addition,

plaintiff seeks compensation for the penalties and taxes that she will incur (amounts presently unknown) as a result of withdrawing money from her retirement accounts since her unlawful termination from MSG.

To the extent that plaintiff is not reinstated to her former position at MSG, plaintiff will also seek an award of front pay and/or reputational damages to compensate plaintiff, from October 1, 2007 through age 65 (January 5, 2028), for expected lost wages, bonuses, and 401(k) contributions, less any work-related compensation that plaintiff expects to earn in mitigation of her damages, in the amount of \$9,762,406. (See attached chart detailing the calculations for back pay and front pay) If plaintiff is not reinstated to her former position at MSG, plaintiff will also seek an Order requiring MSG to make pension payments to her in the amounts that she would have been entitled to receive had her employment not been unlawfully terminated by MSG and had she continued to work at MSG until age 65.

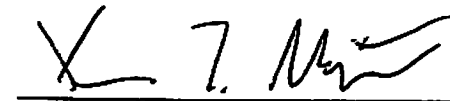
Plaintiff additionally seeks punitive damages from defendants in amounts to be determined by the jury. Plaintiff also seeks attorneys' fees and the costs of this action from defendants in an amount to be determined by the Court. In addition, plaintiff seeks from defendants an award of pre-judgment interest, as well as damages to compensate plaintiff for any adverse tax consequences.

Plaintiff reserves the right to supplement these disclosures as and if additional information becomes available. Plaintiff provides these disclosures without waiving any objections that might apply including, but not limited to, objections relating to privilege, confidentiality, materiality, relevancy or burden.

Dated: New York, New York  
March 19, 2007

VLADECK, WALDMAN, ELIAS &  
ENGELHARD, P.C.

By:



Anne C. Vladeck (AV 4857)  
Kevin T. Mintzer (KM 4741)  
Karen Cacace (KC 3184)  
Attorneys for Plaintiff  
1501 Broadway, Suite 800  
New York, New York 10036  
(212) 403-7300

<u>Years</u>	<u>Plaintiff's MSG Salary with 5% Increases</u>	<u>Plaintiff's MSG Bonus 25% of Salary</u>	<u>Plaintiff's 401K ER Contr. 3% of Gross Salary<sup>1</sup></u>	<u>Plaintiff's MSG Total Compensation</u>	<u>Plaintiff's Job Mitigation with 3% Increases</u>	<u>Difference</u>
2005	0	62,500	0	62,500	0	62,500
2006	262,500	65,625	7,750	335,875	0	335,875
2007	275,625	68,906	8,000	352,531	107,499 <sup>2</sup>	245,032
2008	289,406	72,351	8,000	369,757	115,000 <sup>3</sup>	254,757
2009	303,876	75,969	8,000	387,845	118,450	269,395
2010	319,070	79,761	8,000	406,831	122,003	284,827
2011	335,023	83,755	8,000	426,778	125,663	301,114
2012	351,177	87,794	8,000	446,971	129,432	317,538
2013	369,363	92,340	8,000	469,703	133,314	336,388
2014	387,832	96,958	8,000	492,790	137,313	355,476
2015	407,223	101,805	8,000	517,028	141,432	375,595
2016	427,584	106,896	8,000	542,480	145,674	396,805
2017	448,964	112,241	8,000	569,205	150,004	414,160
2018	471,412	117,853	8,000	597,265	154,504	442,760
2019	494,984	123,746	8,000	626,730	159,139	467,590
2020	519,731	129,932	8,000	657,663	163,913	493,817
2021	545,719	136,429	8,000	690,148	168,830	521,318
2022	573,005	143,251	8,000	724,256	173,895	550,360
2023	601,655	150,413	8,000	760,068	179,111	580,956
2024	631,738	157,934	8,000	797,672	184,484	613,187
2025	663,325	165,831	8,000	837,156	190,018	647,137
2026	696,491	174,831	8,000	879,322	195,718	683,603
2027	731,315	182,828	8,000	922,143	201,589	720,553
2028	767,881	191,970	8,000	967,851	207,636	760,214
	<u>\$10,874,899</u>	<u>\$2,718,821</u>	<u>\$ 175,875</u>	<u>\$13,769,595</u>	<u>\$3,404,621</u>	<u>\$10,364,974</u>

<sup>1</sup> The employer contribution is calculated based on the statutory limit of an employee's contribution of \$15,500 for 2007 and \$16,000 for 2008 and beyond.

<sup>2</sup> 10/12 x \$129,000 per year as consultant.

<sup>3</sup> \$115,000 per year as employee.